

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

TECHNOVATIVE MEDIA, INC.,

Debtor,

HAWK INVESTMENT HOLDINGS LTD.,

Movant,

v.

TECHNOVATIVE MEDIA, INC.,

Debtor/Respondent.

CHAPTER 11

CASE NO.: 23-10764 MDC

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Hawk Investment Holdings Ltd. ("Hawk") has filed a *Motion for Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code* with the court for the purposes of allowing the Delaware Court of Chancery to proceed to a bench trial originally scheduled for March 23, 2023.

1. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).**
2. **If you do not want the court to grant the relief sought in the Motion or if you want the Court to consider your views on the Motion, then on or before **April 5, 2023** you or your attorney must file a response to the Motion. (see *Instructions on next page*).**
3. Any replies are due on April 14, 2023 by 5:00 p.m.

3. **A hearing on the Motion** is scheduled to be held on **April 19, 2023, at 11:00 a.m. in Courtroom 2, United States Bankruptcy Court**, Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Suite 202, Philadelphia, PA 19107. Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing**.

4. **If you do not file a response to the Motion**, the court may cancel the hearing and enter an order granting the relief requested in the Motion.

5. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

6. If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1**, you must file your response electronically.

8. **If you are not required to file electronically**, you must file your response at 900 Market Street, # 400, Philadelphia, PA, 19107.

9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.

10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

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600 King Street, Suite 901  
Wilmington, DE 19801  
Telephone: (302) 416-7000  
Email: steven.caponi@klgates.com

Dated: March 23, 2023

**K&L GATES LLP**

/s/ Steven L. Caponi  
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**CERTIFICATE OF SERVICE**

I certify that on March 23, 2023, I caused the attached Notice of Motion, Response Deadline and Hearing Date to be electronically filed with the Clerk, United States Bankruptcy Court, Eastern District of Pennsylvania, by ECF and email and one copy of the aforementioned document by way of ECF and email to those persons listed on the attached service list.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is willfully false, I am subject to punishment.

Dated: March 23, 2023

**K&L GATES LLP**

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*Attorneys for Hawk Investment Holdings Ltd.*

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